

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

North States Industries, Inc.,

Plaintiff,

v.

Patent Compliance Group, Inc.

Defendant.

Court File No. 10-cv-820 (DWF/JSM)

**DECLARATION OF MICHAEL
ZWEBER IN SUPPORT OF PATENT
COMPLIANCE GROUP, INC.'S
MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

Michael Zweber declares:

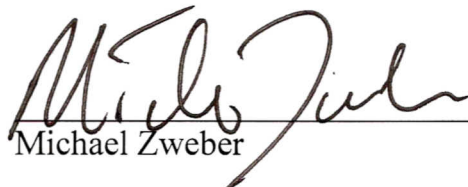
1. I am over the age of twenty-one (21) years, have never been convicted of a felony, and am fully competent to make this declaration. I have personal knowledge of the matters set forth herein and know them to be true and correct.
2. I am the President and Secretary of Patent Compliance Group ("PCG").
3. PCG is a Texas Corporation that maintains its principal place of business at 4223 Buena Vista, Suite 4, Dallas, Texas 75205. PCG does not maintain an office or an address of any kind in Minnesota and conducts no business within the state. PCG does not manufacture, produce or distribute any products that are placed into the national stream of commerce.
4. PCG has no presence in Minnesota. PCG does not own property in the state, has never paid taxes in the state, does not maintain a bank account in the state, and does not transact business with any person or entity located within the state. The first ad

only contact that PCG has ever had with any person or entity from Minnesota is in connection with a lawsuit PCG filed against NSI in the Northern District of Texas.

5. Attached hereto as Exhibit A is a true and correct copy of the Complaint (without Exhibits) that PCG filed against North States Industries, Inc. ("NSI") on March 1, 2010. Prior to filing the Complaint, PCG had no contact with NSI or any other person or entity from Minnesota.

6. Since filing its Complaint against NSI on March 1, 2010, PCG has had a limited number communications with NSI – all of which related the lawsuit that PCG initiated in the Northern District of Texas and/or the instant suit. Specifically, on March 1, 2010, PCG sent NSI a transmittal letter enclosing a copy of its Complaint, forms requesting a waiver of service of summons, an introduction letter explaining the nature of PCG's lawsuit, and a preservation notice relating to potentially relevant NSI documents and electronically stored information. PCG has not had any other direct contact with NSI except for communications with NSI's outside counsel, Jeffer Ali, all of which related to: (i) PCG's request for waiver of service of summons in the Texas Case; (ii) NSI's subsequent filing of this case; and/or (iii) the prospect of resolving the dispute between the parties.

I declare under penalty of perjury under the laws of the State of Minnesota that the foregoing is true and correct, and that this declaration was executed on April 6, 2010 in Dallas, Texas.


Michael Zweber